

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

KATHY TEAGUE,	)	
	)	
Plaintiffs,	)	CIVIL ACTION FILE NO.:
	)	
v.	)	_____
	)	
ALDRIDGE PITE HAAN, LLP,	)	
	)	
Defendant.	)	
_____	)	

**EXHIBIT “D” AFFIDAVIT OF GARNISHMENT**

IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA

FEB 10, 2022 07:55 AM

**Plaintiff:**

AmeriCredit Financial Services, Inc. d/b/a GM Financial

**Plaintiff's contact information:**c/o Gregson T. Haan  
Aldridge Pite Haan, LLP  
PO Box 52815  
Atlanta, GA 30355  
garnishments@aph-law.com  
1.800.844.0045  
APH File No. 16-14659

Date Filed:

Case No:

**GARNISHMENT****Garnishment Court Information**12 East Park Square  
Marietta GA 30090  
770/528-1218*Robin C. Bishop*Robin C. Bishop, Clerk of State Court  
Cobb County, Georgia

vs.

KATHY TEAGUE  
145 MACADAMIA CT  
COVINGTON GA 30016**Garnishee:**PIEDMONT HEALTHCARE, INC.  
AFS: CSC of Cobb County, Inc.  
192 Anderson Street, N.E., Suite 125  
Marietta, GA 30060**AFFIDAVIT OF CONTINUING GARNISHMENT****DO NOT USE THIS FORM FOR A CONTINUING GARNISHMENT FOR CHILD SUPPORT OR ALIMONY, SEE  
O.C.G.A. §18-4-73**

Personally appeared Gregson T. Haan, who on oath says:

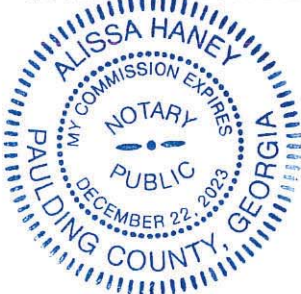
1. I am the Attorney at Law for Plaintiff.
2. The Plaintiff obtained a judgment against the Defendant in Case Number 1608536 in the MAGISTRATE Court of NEWTON County, Georgia, and no agreement requires forbearance from the garnishment which is applied for currently.
3. \$12,365.22 is the balance due, which consists of the sum \$11,027.48 Principal, \$.00 Post Judgment interest, and \$1,337.74 Other (e.g., prejudgment interest, attorney's fees, costs [exclusive of the cost of this action]).
4. Upon the Affiant's personal knowledge or belief, the sum stated herein is unpaid.
5. The Affiant believes that the Garnishee is an employer of or under periodic obligations for payment of funds to the Defendant.

This the 4 day of February, 20 22.

Affiant

Gregson T. Haan  
GA Bar No. 316070Executed, subscribed, and sworn to before me on the  
above written date

NOTARY PUBLIC or DEPUTY CLERK OF COURT



16-14659

WRIT OF FIERI FACIAS  
IN THE NEWTON COUNTY MAGISTRATE COURT  
STATE OF GEORGIA

A. Case Number:	2016-MG-CV-8536-		
B. Plaintiff(s):	AMERICREDIT FINANCIAL SERVICES INC DBA GM FINANCIAL SERVICES		
C. Defendant(s):	TEAGUE TIMOTHY		
D. Attorney for Plaintiff(s):	1. Name:	WHIDDON JAMES G III	
	2. Address:	ALDRIDGE PITE HAAN LLP PO BOX 52815 ATLANTA GA 30355	
	3. Telephone:	4702403440	
E. Judgment Amount:	1. Principal:	\$11,027.48	INTEREST SHALL ACCRUE FROM THE DATE HEREOF ON THE PRINCIPAL SUM AT THE STATUTORY RATE AS PROVIDED BY O.C.G.A. 7-7- 12, UNTIL PAID
	2. Principal2:		
	3. Interest:		
	4. Interest2:		
	5. Interest - Other:		
	6. Attorney's Fees:	\$1,127.74	
	7. Court Costs:	\$151.00	
	8. Fifa Issue:	\$9.00	
F. Total Judgment Amount:	\$12,315.22		<b>DOCH 002772</b> <b>FILED IN OFFICE</b> <b>7/11/2017 10:53 AM</b> <b>EK:208 PG:211 211</b> <b>LINDA D. HAYS</b> <b>CLERK OF SUPERIOR COURT</b> <b>NEWTON COUNTY</b>
G. Judgment Date:	11/18/2016		
H. Fi. Fa. in Hands of:	ALDRIDGE PITE HAAN LLP		
I. Judge:	KIM DEGONIA		
J. Date Writ of Fieri Facias Signed by Clerk:	07/05/2017		

TO ALL AND SINGULAR the sheriffs of the State, their lawful deputies, and the constables of the Court:

You are commanded to:

1. Levy and seize upon the goods, chattel (personal and movable property), lands and tenements of the above-named Defendant(s) to satisfy the judgment in the sums stated above (E) (1-5), including interest from the date of judgment at the legal rate;
  2. Deliver and make a return of said goods, chattel, lands and tenements to the Court. The following property (if described herein) shall be levied upon:
  3. Deliver the sums, plus applicable interest and costs, enumerated in (E) above, to the Court to render to the Plaintiff(s).
- Witness the Honorable Judge of Court (I) named above, on the date stated (J).

  
 LINDA D. HAYS  
 NEWTON COUNTY MAGISTRATE COURT

CANCELLATION

The within and foregoing Fi. Fa., having been paid in full, the Clerk of Superior Court is hereby directed to cancel it of record on the date stated

Signature:	Title:	Date:
------------	--------	-------

FILING INFORMATION

Date Filed:	Filed By:
Execution/Lien Book Number:	Title:
Page Number:	Signature:



IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA

**Plaintiff:**

AmeriCredit Financial Services, Inc. d/b/a GM Financial

**Plaintiff's contact information:**

c/o Gregson T. Haan  
Aldridge Pite Haan, LLP  
PO Box 52815  
Atlanta, GA 30355  
garnishments@aph-law.com  
1.800.844.0045  
APH File No. 16-14659

Date Filed:

Case No:

**GARNISHMENT**

**Garnishment Court Information**

12 East Park Square  
Marietta GA 30090  
770/528-1218

vs.

KATHY TEAGUE  
145 MACADAMIA CT  
COVINGTON GA 30016

**Garnishee:**

PIEDMONT HEALTHCARE, INC.  
AFS: CSC of Cobb County, Inc.  
192 Anderson Street, N.E., Suite 125  
Marietta, GA 30060

**NOTICE TO DEFENDANT OF RIGHT AGAINST GARNISHMENT OF MONEY,  
INCLUDING WAGES, AND OTHER PROPERTY**

You received this notice because money, including wages and other property belonging to you have been garnished to pay a court judgment against you. HOWEVER, YOU MAY BE ABLE TO KEEP YOUR MONEY, INCLUDING WAGES, OR OTHER PROPERTY. **READ THIS NOTICE CAREFULLY.**

State and federal law protects some money, including wages, from garnishment even if it is in a bank. Some common exemptions are benefits from social security, supplemental security income, unemployment, workers' compensation, the Veterans' Administration, state pension, retirement funds and disability income. This list of exemptions does not include all possible exemptions. A more detailed list of exemptions is available at the COBB County STATECourt's office located at 12 East Park Square, Marietta GA 30090, 770/528-1218, and on the website for the Attorney General ([www.law.ga.gov](http://www.law.ga.gov)).

Garnishment of your earnings from your employment is limited to the lesser of 25 percent of your disposable earnings for a week or the amount by which your disposable earnings for a week exceed \$217.50. More than 25 percent of your disposable earnings may be taken from your earnings for the payment of child support or alimony or if a Chapter 13 bankruptcy allows a higher amount.

**TO PROTECT YOUR MONEY, INCLUDING WAGES, AND OTHER PROPERTY FROM BEING GARNISHED, YOU MUST:**

1. Complete the Defendant's Claim Form as set forth below; and
2. File this completed claim form with the COBB County STATECourt's office located at 12 East Park Square, Marietta GA 30090, 770/528-1218.

**FILE YOUR COMPLETED CLAIM FORM AS SOON AS POSSIBLE.** You may lose your right to claim an exemption if you do not file your claim form within 20 days after the Garnishee's Answer is filed or if you do not mail or deliver a copy of your completed claim form to the Plaintiff and the Garnishee at the addresses listed on this notice.

- The Court will schedule a hearing within ten days from when it receives your claim form. The Court will mail you the time and date of the hearing at the address that you provide on your claim form. You may go to the hearing with or without an attorney. You will need to give the Court documents or other proof that your money is exempt.

- The COBB County STATE Courts Office staff cannot give you legal advice. **IF YOU NEED LEGAL ASSISTANCE, YOU SHOULD SEE AN ATTORNEY.** If you cannot afford a private attorney, legal services may be available.

**DEFENDANT'S CLAIM FORM**

Case No. \_\_\_\_\_

12 East Park Square  
 Marietta GA 30090  
 770/528-1218

**I CLAIM EXEMPTION from Garnishment. Some of my money or property held by the garnishee is exempt because it is: (check all that apply).**

- ☐ 1. Social Security Benefits.
- ☐ 2. Supplemental security income benefits.
- ☐ 3. Unemployment benefits.
- ☐ 4. Workers' compensation.
- ☐ 5. Veterans' benefits.
- ☐ 6. State pension benefits.
- ☐ 7. Disability income benefits.
- ☐ 8. Money that belongs to a joint account holder.
- ☐ 9. Child support or alimony.
- ☐ 10. Exempt wages, retirement, or pension benefits.
- ☐ 11. Exemptions for taxes due on income or earnings not subject to employer withholding.
- ☐ 12. Other exemptions as provided by law.

Explain:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I further state: (check all that apply).

- ☐ 1. The Plaintiff does not have a judgment against me.
- ☐ 2. The amount shown due on the Plaintiff's Affidavit of Garnishment is incorrect.
- ☐ 3. The Plaintiff's Affidavit of Garnishment is untrue or legally insufficient.

Send the notice of the hearing on my claim to me at:

Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

The statements made in this claim form are true to the best of my knowledge and belief.

\_\_\_\_\_, 20\_\_\_\_.

Defendant's signature \_\_\_\_\_ Date \_\_\_\_\_

\_\_\_\_\_  
 Print Name of Defendant

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the Plaintiff or Plaintiff's Attorney and the Garnishee in the foregoing matter with a copy of this pleading by depositing it in the United States Mail in a properly addressed envelop with adequate postage thereon.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
 Defendant or Defendant's Attorney  
 APH File No. 16-14659

IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA

**Plaintiff:**

AmeriCredit Financial Services, Inc. d/b/a GM Financial

**Plaintiff's contact information:**

c/o Gregson T. Haan

Aldridge Pite Haan, LLP

PO Box 52815

Atlanta, GA 30355

garnishments@aph-law.com

1.800.844.0045

APH File No. 16-14659

Date Filed:

Case No:

**GARNISHMENT****Garnishment Court Information**

12 East Park Square

Marietta GA 30090

770/528-1218

vs.

KATHY TEAGUE

145 MACADAMIA CT

COVINGTON GA 30016

**Garnishee:**

PIEDMONT HEALTHCARE, INC.

AFS: CSC of Cobb County, Inc.

192 Anderson Street, N.E., Suite 125

Marietta, GA 30060

**ANSWER FOR CONTINUING GARNISHMENT**

1. From the time of service of the Summons of Continuing Garnishment, if this is the first Garnishee Answer to such summons, otherwise from the time of the last Garnishee Answer to the Summons of Continuing Garnishment until the time of this Garnishee Answer, the Garnishee had in the Garnishee's possession the following described property of the Defendant: \_\_\_\_\_.
2. From the time of service of the Summons of Continuing Garnishment, if this is the first Garnishee Answer to such summons, otherwise from the time of the last Garnishee Answer to the Summons of Continuing Garnishment until the time of this Garnishee Answer, all obligations accruing from the Garnishee to the Defendant are in the amount of \$ \_\_\_\_\_.
3. \$ \_\_\_\_\_ of the amount named in paragraph 2 were wages earned at the rate of \$ \_\_\_\_\_ per \_\_\_\_\_ for the period beginning \_\_\_\_\_, 20\_\_\_\_ (date), through the time of making this Garnishee Answer. The amount of wages which is subject to this garnishment is computed as follows:
  - \$ \_\_\_\_\_ Gross earnings
  - \$ \_\_\_\_\_ Total social security, tax withholdings and other mandatory deductions required by law.
  - \$ \_\_\_\_\_ Total disposable earnings
  - \$ \_\_\_\_\_ Amount of wages subject to garnishment.
4. \$ \_\_\_\_\_ is the amount herewith paid into court.
5. ☐ Check this box if the Defendant is not presently employed by or owed periodic payments by the Garnishee.
6. ☐ Check this box if the Defendant was employed by or owed periodic payments by the Garnishee on or after service of the Summons of Continuing Garnishment but was terminated as of \_\_\_\_\_, 20\_\_\_\_.
7. ☐ Check this box if this is the last Garnishee Answer this Garnishee is required to file to the presently pending Summons of Garnishment in the above-styled case.
8. The Garnishee further states: \_\_\_\_\_

Filed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Garnishee, Garnishee's Attorney, or Officer or  
Employee of Garnishee

\_\_\_\_\_  
Court Clerk/Deputy Clerk**CERTIFICATE OF SERVICE**

This is to certify that I have this day served the Defendant or Defendant's Attorney and the Plaintiff or Plaintiff's Attorney is the foregoing matter with a copy of this pleading by depositing it in the United States Mail in a properly addressed envelope with adequate postage thereon.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Garnishee